

**Executive Summary – Enforcement Matter – Case No. 52173**  
**Anadarko E&P Onshore LLC**  
**RN102585965**  
**Docket No. 2016-0604-AIR-E**

**Order Type:**

1660 Agreed Order

**Findings Order Justification:**

N/A

**Media:**

AIR

**Small Business:**

No

**Location(s) Where Violation(s) Occurred:**

Central Compressor Station, located 1.5 miles west of Carthage on Highway 79, Panola County

**Type of Operation:**

Natural gas compressor station

**Other Significant Matters:**

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

**Texas Register Publication Date:** July 29, 2016

**Comments Received:** No

***Penalty Information***

**Total Penalty Assessed:** \$73,200

**Amount Deferred for Expedited Settlement:** \$14,640

**Amount Deferred for Financial Inability to Pay:** \$0

**Total Paid to General Revenue:** \$58,560

**Total Due to General Revenue:** \$0

Payment Plan: N/A

**Supplemental Environmental Project ("SEP") Conditional Offset:** \$0

Name of SEP: N/A

**Compliance History Classifications:**

Person/CN - Satisfactory

Site/RN - Satisfactory

**Major Source:** Yes

**Statutory Limit Adjustment:** N/A

**Applicable Penalty Policy:** April 2014

***Investigation Information***

**Complaint Date(s):** N/A

**Complaint Information:** N/A

**Date(s) of Investigation:** January 25, 2016

**Date(s) of NOE(s):** March 24, 2016

**Executive Summary – Enforcement Matter – Case No. 52173**  
**Anadarko E&P Onshore LLC**  
**RN102585965**  
**Docket No. 2016-0604-AIR-E**

***Violation Information***

Failed to comply with the permitted hourly and permitted annual emissions rates. Specifically, from January 1, 2014 through December 31, 2014, the Respondent exceeded the permitted hourly and permitted annual emission rates for particulate matter equal to or less than 2.5 microns in size ("PM2.5") for eight compressor engines, resulting in a total of 3.562 tons of PM2.5 emissions [30 TEX. ADMIN. CODE §§ 116.615(2) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), Federal Operating Permit No. 0739/General Operating Permit No. 514, Site-wide Requirements (b)(9)(E)(ii), and Standard Permit Registration No. 74457].

***Corrective Actions/Technical Requirements***

**Corrective Action(s) Completed:**

N/A

**Technical Requirements:**

The Order will require the Respondent to:

- a. Within 30 days, submit an administratively complete permit amendment application to increase the PM2.5 emissions rates for Compressor Engines C-20, C-21, C-22, C-23, C-24, C-25, C-26, and C-31;
- b. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the application within 30 days after the date of such requests, or by any other deadline specified in writing; and
- c. Within 180 days, submit written certification that either a permit amendment has been obtained or that operation has ceased until such time that appropriate authorization is obtained.

***Litigation Information***

**Date Petition(s) Filed:** N/A

**Date Answer(s) Filed:** N/A

**SOAH Referral Date:** N/A

**Hearing Date(s):** N/A

**Settlement Date:** N/A

**Executive Summary – Enforcement Matter – Case No. 52173**  
**Anadarko E&P Onshore LLC**  
**RN102585965**  
**Docket No. 2016-0604-AIR-E**

***Contact Information***

**TCEQ Attorney:** N/A

**TCEQ Enforcement Coordinator:** Raime Hayes-Falero, Enforcement Division,  
Enforcement Team 5, MC R-12, (713) 767-3567; Michael Parrish, Enforcement Division,  
MC 219, (512) 239-2548

**TCEQ SEP Coordinator:** N/A

**Respondent:** Steven Dutcher, Operations Manager, Anadarko E&P Onshore LLC,  
P.O. Box 1330, Houston, Texas 77251

**Respondent's Attorney:** N/A





# Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

**TCEQ**

<b>DATES</b>	<b>Assigned</b>	28-Mar-2016	<b>Screening</b>	12-Apr-2016	<b>EPA Due</b>	20-Sep-2016
	<b>PCW</b>	12-Apr-2016				

## RESPONDENT/FACILITY INFORMATION

<b>Respondent</b>	Anadarko E&P Onshore LLC		
<b>Reg. Ent. Ref. No.</b>	RN102585965		
<b>Facility/Site Region</b>	5-Tyler	<b>Major/Minor Source</b>	Major

## CASE INFORMATION

<b>Enf./Case ID No.</b>	52173	<b>No. of Violations</b>	1
<b>Docket No.</b>	2016-0604-AIR-E	<b>Order Type</b>	1660
<b>Media Program(s)</b>	Air	<b>Government/Non-Profit</b>	No
<b>Multi-Media</b>		<b>Enf. Coordinator</b>	Amancio R. Gutierrez
		<b>EC's Team</b>	Enforcement Team 5
<b>Admin. Penalty \$ Limit Minimum</b>	\$0	<b>Maximum</b>	\$25,000

## Penalty Calculation Section

<b>TOTAL BASE PENALTY (Sum of violation base penalties)</b>	<b>Subtotal 1</b>	\$60,000
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## ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

<b>Compliance History</b>	22.0%	<b>Adjustment</b>	<b>Subtotals 2, 3, &amp; 7</b>	\$13,200
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Notes

Enhancement for one NOV with dissimilar violations and one order containing a denial of liability.

<b>Culpability</b>	No	0.0%	<b>Enhancement</b>	<b>Subtotal 4</b>	\$0
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Notes

The Respondent does not meet the culpability criteria.

<b>Good Faith Effort to Comply Total Adjustments</b>	<b>Subtotal 5</b>	\$0
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<b>Economic Benefit</b>	0.0%	<b>Enhancement*</b>	<b>Subtotal 6</b>	\$0
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Total EB Amounts \$709  
Estimated Cost of Compliance \$5,000

\*Capped at the Total EB \$ Amount

<b>SUM OF SUBTOTALS 1-7</b>	<b>Final Subtotal</b>	\$73,200
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<b>OTHER FACTORS AS JUSTICE MAY REQUIRE</b>	0.0%	<b>Adjustment</b>	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

<b>Final Penalty Amount</b>	\$73,200
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<b>STATUTORY LIMIT ADJUSTMENT</b>	<b>Final Assessed Penalty</b>	\$73,200
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<b>DEFERRAL</b>	20.0%	<b>Reduction</b>	<b>Adjustment</b>	-\$14,640
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes

Deferral offered for expedited settlement.

<b>PAYABLE PENALTY</b>	\$58,560
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Screening Date 12-Apr-2016

Docket No. 2016-0604-AIR-E

PCW

Respondent Anadarko E&amp;P Onshore LLC

Policy Revision 4 (April 2014)

Case ID No. 52173

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102585965

Media [Statute] Air

Enf. Coordinator Amancio R. Gutierrez

## Compliance History Worksheet

## &gt;&gt; Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action ( <i>number of NOVs meeting criteria</i> )	0	0%
	Other written NOVs	1	2%
Orders	Any agreed final enforcement orders containing a denial of liability ( <i>number of orders meeting criteria</i> )	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government ( <i>number of judgments or consent decrees meeting criteria</i> )	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government ( <i>number of counts</i> )	0	0%
Emissions	Chronic excessive emissions events ( <i>number of events</i> )	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which notices were submitted</i> )	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 22%

## &gt;&gt; Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

## &gt;&gt; Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

## &gt;&gt; Compliance History Summary

Compliance  
History  
Notes

Enhancement for one NOV with dissimilar violations and one order containing a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, &amp; 7) 22%

## &gt;&gt; Final Compliance History Adjustment

Final Adjustment Percentage \*capped at 100% 22%

Screening Date 12-Apr-2016

Docket No. 2016-0604-AIR-E

PCW

Respondent Anadarko E&amp;P Onshore LLC

Policy Revision 4 (April 2014)

Case ID No. 52173

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102585965

Media [Statute] Air

Enf. Coordinator Amancio R. Gutierrez

Violation Number 1

Rule Cite(s)

30 Tex. Admin. Code §§ 116.615(2) and 122.143(4), Tex. Health & Safety Code § 382.085(b), Federal Operating Permit No. 0739/General Operating Permit No. 514, Site-wide Requirements (b)(9)(E)(ii), and Standard Permit Registration No. 74457

Violation Description

Failed to comply with the permitted hourly and permitted annual emission rates. Specifically, from January 1, 2014 through December 31, 2014, the Respondent exceeded the permitted hourly and permitted annual emissions rates for particulate matter equal to or less than 2.5 microns in size ("PM2.5") for eight compressor engines, resulting in a total of 3.562 tons of unauthorized PM2.5 emissions (see the attached table).

Base Penalty \$25,000

## &gt;&gt; Environmental, Property and Human Health Matrix

OR

Release	Harm		
	Major	Moderate	Minor
Actual			X
Potential			

Percent 15.0%

## &gt;&gt; Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.

Adjustment \$21,250

\$3,750

## Violation Events

Number of Violation Events 16

365 Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	X
annual	
single event	

Violation Base Penalty \$60,000

Sixteen semiannual events are recommended for the period of non-compliance from January 1, 2014 through December 31, 2014 (two events for each engine).

## Good Faith Efforts to Comply

0.0%

Reduction \$0

Before NOE/NOV NOE/NOV to EDP/PRP/Settlement Offer

Extraordinary	
Ordinary	
N/A	X

Notes

The Respondent does not meet the good faith criteria for this violation.

Violation Subtotal \$60,000

## Economic Benefit (EB) for this violation

## Statutory Limit Test

Estimated EB Amount \$709

Violation Final Penalty Total \$73,200

This violation Final Assessed Penalty (adjusted for limits) \$73,200

# Economic Benefit Worksheet

**Respondent** Anadarko E&P Onshore LLC

**Case ID No.** 52173

**Reg. Ent. Reference No.** RN102585965

**Media** Air

**Violation No.** 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
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## Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	\$5,000	1-Jan-2014	1-Nov-2016	2.84	\$709	n/a	\$709
Other (as needed)				0.00	\$0	n/a	\$0

**Notes for DELAYED costs**

Estimated cost to obtain a permit amendment to increase the PM2.5 emissions rates for Compressor Engines C-20, C-21, C-22, C-23, C-24, C-25, C-26, and C-31. The Date Required is the first date of non-compliance and the Final Date is the estimated date of compliance.

## Avoided Costs

**ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)**

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

**Notes for AVOIDED costs**

**Approx. Cost of Compliance**

\$5,000

**TOTAL**

\$709



Attachment A

Anadarko E&P Onshore LLC

Docket No. 2016-0604-AIR-E

Unauthorized PM 2.5 Emissions from January 1, 2014 through December 31, 2014

Compressor Engine	Permitted Hourly Emissions Rate (Pound Per Hour "lb/hr")	Actual Hourly Emissions Rate (lb/hr)	Unauthorized Hourly Emissions Rate (lb/hr)	Permitted Annual Emissions Rate (Ton Per Year "tpy")	Actual Annual Emissions Rate (tpy)	Unauthorized Emissions (tons)
C-20	0.001	0.110	0.109	0.004	0.469	0.465
C-21	0.001	0.110	0.109	0.002	0.306	0.304
C-22	0.001	0.110	0.109	0.004	0.325	0.321
C-23	0.001	0.110	0.109	0.004	0.150	0.146
C-24	0.001	0.120	0.119	0.004	0.470	0.466
C-25	0.001	0.110	0.109	0.004	0.248	0.244
C-26	0.001	0.110	0.109	0.004	0.280	0.276
C-31	0.002	0.310	0.308	0.010	1.350	1.340
Total:						3.562



The TCEQ is committed to accessibility.

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



## TCEQ Compliance History Report

**PUBLISHED** Compliance History Report for CN602947558, RN102585965, Rating Year 2015 which includes Compliance History (CH) components from September 1, 2010, through August 31, 2015.

<b>Customer, Respondent, or Owner/Operator:</b>	CN602947558, Anadarko E&P Onshore LLC	<b>Classification:</b>	SATISFACTORY	<b>Rating:</b>	0.53
<b>Regulated Entity:</b>	RN102585965, CENTRAL COMPRESSOR STATION	<b>Classification:</b>	SATISFACTORY	<b>Rating:</b>	3.33
<b>Complexity Points:</b>	8	<b>Repeat Violator:</b>	NO		
<b>CH Group:</b>	14 - Other				
<b>Location:</b>	SITE IS LOCATED 1.5 MI WEST OF CARTHAGE ON HWY 79 CARTHAGE, TX, PANOLA COUNTY				
<b>TCEQ Region:</b>	REGION 05 - TYLER				

### ID Number(s):

**AIR OPERATING PERMITS** PERMIT 739

**AIR NEW SOURCE PERMITS** ACCOUNT NUMBER PB0003L

**AIR NEW SOURCE PERMITS** PERMIT 7775

**AIR NEW SOURCE PERMITS** AFS NUM 4836500001

**AIR NEW SOURCE PERMITS** REGISTRATION 110872

**AIR NEW SOURCE PERMITS** REGISTRATION 110877

**AIR EMISSIONS INVENTORY** ACCOUNT NUMBER PB0003L

**AIR OPERATING PERMITS** ACCOUNT NUMBER PB0003L

**AIR NEW SOURCE PERMITS** PERMIT 8413

**AIR NEW SOURCE PERMITS** REGISTRATION 74457

**AIR NEW SOURCE PERMITS** REGISTRATION 110870

**AIR NEW SOURCE PERMITS** REGISTRATION 110880

**AIR NEW SOURCE PERMITS** REGISTRATION 110875

**Compliance History Period:** September 01, 2010 to August 31, 2015

**Rating Year:** 2015

**Rating Date:** 09/01/2015

**Date Compliance History Report Prepared:** April 12, 2016

**Agency Decision Requiring Compliance History:** Enforcement

**Component Period Selected:** April 12, 2011 to April 12, 2016

**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.**

**Name:** Amancio R. Gutierrez

**Phone:** (512) 239-3921

### Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

### Components (Multimedia) for the Site Are Listed in Sections A - J

#### **A. Final Orders, court judgments, and consent decrees:**

1 Effective Date: 10/02/2011 ADMINORDER 2011-0360-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: GOP 514 SW (b)(8)(B)(i)(c) OP

Description: Failure to maintain an observation log for visible emissions from stationary vents.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 122, SubChapter B 122.145(2)(B)

30 TAC Chapter 122, SubChapter B 122.146(5)(C)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: GOP 514 SW (b)(2) OP

Description: Failure to include all deviations in deviation reports and the annual permit compliance certification ("PCC"), as documented during an investigation conducted on January 26, 2011. Specifically, deviation reports for the periods August 15, 2009 through February 14, 2010 and February 15, 2010 through August 15, 2010, were never submitted, and the PCC for the period August 15, 2009 through August 14, 2010 failed to contain the 616 blowdowns to the flare that the Respondent determined.....

#### **B. Criminal convictions:**

N/A

#### **C. Chronic excessive emissions events:**

N/A

#### **D. The approval dates of investigations (CCEDS Inv. Track. No.):**

Item 1 October 17, 2011 (958611)

Item 2	December 12, 2012	(1045945)
Item 3	August 05, 2013	(1103884)
Item 4	August 19, 2013	(1113136)
Item 5	October 01, 2014	(1195798)
Item 6	May 29, 2015	(1205369)

**E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):**

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

1 Date: 03/24/2016 (1299613) CN602947558  
 Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)  
 30 TAC Chapter 122, SubChapter B 122.145(2)(C)  
 5C THSC Chapter 382 382.085(b)  
 Site Wide Requirement (b)(2) OP  
 Description: Failure to report all deviations within thirty (30) days after the end of the reporting period.  
 Self Report? NO Classification: Moderate  
 Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)  
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6625(b)(3)  
 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6635(a)  
 5C THSC Chapter 382 382.085(b)  
 Site Wide Requirement 28 OP  
 Description: Failure to collect data at least once every 15 minutes from the Continuous Parameter Monitoring System (CPMS).

**F. Environmental audits:**

N/A

**G. Type of environmental management systems (EMSs):**

N/A

**H. Voluntary on-site compliance assessment dates:**

N/A

**I. Participation in a voluntary pollution reduction program:**

N/A

**J. Early compliance:**

N/A

**Sites Outside of Texas:**

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN  
ENFORCEMENT ACTION  
CONCERNING  
ANADARKO E&P ONSHORE LLC  
RN102585965**

§  
§  
§  
§  
§

**BEFORE THE  
  
TEXAS COMMISSION ON  
  
ENVIRONMENTAL QUALITY**

## **AGREED ORDER DOCKET NO. 2016-0604-AIR-E**

### **I. JURISDICTION AND STIPULATIONS**

On \_\_\_\_\_, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Anadarko E&P Onshore LLC (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a natural gas compressor station located 1.5 miles west of Carthage on Highway 79 in Panola County, Texas (the "Plant"). The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$73,200 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$58,560 of the penalty and \$14,640 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or

required in this action, are waived in the interest of a more timely resolution of the matter.

6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.

## II. ALLEGATIONS

During an investigation conducted on January 25, 2016, an investigator documented that the Respondent failed to comply with the permitted hourly and permitted annual emissions rates, in violation of 30 TEX. ADMIN. CODE §§ 116.615(2) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), Federal Operating Permit No. 0739/General Operating Permit No. 514, Site-wide Requirements (b)(9)(E)(ii), and Standard Permit Registration No. 74457. Specifically, from January 1, 2014 through December 31, 2014, the Respondent exceeded the permitted hourly and permitted annual emission rates for particulate matter equal to or less than 2.5 microns in size ("PM2.5") for eight compressor engines, resulting in a total of 3.562 tons of PM2.5 emissions (see the table below).

Unauthorized PM 2.5 Emissions from January 1, 2014 through December 31, 2014						
Compressor Engine	Permitted Hourly Emissions Rate (Pound Per Hour "lb/hr")	Actual Hourly Emissions Rate (lb/hr)	Unauthorized Hourly Emissions Rate (lb/hr)	Permitted Annual Emissions Rate (Ton Per Year "tpy")	Actual Annual Emissions Rate (tpy)	Unauthorized Emissions (tons)
C-20	0.001	0.110	0.109	0.004	0.469	0.465
C-21	0.001	0.110	0.109	0.002	0.306	0.304
C-22	0.001	0.110	0.109	0.004	0.325	0.321
C-23	0.001	0.110	0.109	0.004	0.150	0.146
C-24	0.001	0.120	0.119	0.004	0.470	0.466
C-25	0.001	0.110	0.109	0.004	0.248	0.244
C-26	0.001	0.110	0.109	0.004	0.280	0.276
C-31	0.002	0.310	0.308	0.010	1.350	1.340
Total:						3.562

### III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

### IV. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Anadarko E&P Onshore LLC, Docket No. 2016-0604-AIR-E" to:

Financial Administration Division, Revenue Operations Section  
Attention: Cashier's Office, MC 214  
Texas Commission on Environmental Quality  
P.O. Box 13088  
Austin, Texas 78711-3088

2. The Respondent shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Order, submit an administratively complete permit amendment application to increase the PM<sub>2.5</sub> emissions rates for Compressor Engines C-20, C-21, C-22, C-23, C-24, C-25, C-26, and C-31, in accordance with 30 TEX. ADMIN. CODE § 116.111 to:

Air Permits Division, MC 162  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

- b. Respond completely and adequately, as determined by the TCEQ, to all requests for information concerning the application within 30 days after the date of such requests, or by any other deadline specified in writing; and
  - c. Within 180 days after the effective date of this Order, submit written certification that either a permit amendment has been obtained or that operation has ceased until such time that appropriate authorization is obtained. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I

am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team  
Enforcement Division, MC 149A  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

with a copy to:

Air Section Manager  
Tyler Regional Office  
Texas Commission on Environmental Quality  
2916 Teague Drive  
Tyler, Texas 75701-3734

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.
5. If the Respondent fails to comply with any of the Ordering Provisions in this Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
6. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Order Compliance Team at the address listed above.
7. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.



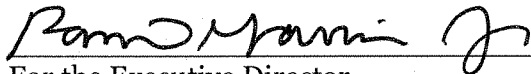
8. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
9. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

## SIGNATURE PAGE

### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



10/3/16

For the Executive Director

Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature

06/30/2016

Date

Steven Dutcher

Name (Printed or typed)  
Authorized Representative of  
Anadarko E&P Onshore LLC

Operations Manager

Title

**Instructions:** Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section IV, Paragraph 1 of this Order.

☐ If mailing address has changed, please check this box and provide the new address below: